

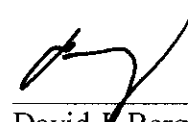
5. The entire body of Massachusetts CORI information as to the Plaintiff is thus irrelevant and has nothing to do with impeachment.

6. The Plaintiff does not know what the entire body of CORI information in Florida, Virginia, and South Carolina contains, and believes that it is the Defendant's responsibility to bring that information before the Court before its motion can be properly addressed.

WHEREFORE, the Plaintiff respectfully requests:

- A. That Defendant's request for access to CORI information be denied in part.
- B. That Defendant be permitted access to CORI information regarding criminal convictions only with respect to 1) convictions of crimes punishable by death or imprisonment in excess of one year and 2) convictions of crimes involving dishonesty or false statement.
- C. That the Defendant be permitted no other access to CORI information.
- D. For such other and further relief as may be just.

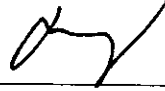
Respectfully submitted for the
the Plaintiff, Anthony Dacre,
by his attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on this date, I sent a copy of this pleading to Joseph A. Regan, Esq.



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Dated: September 10, 2004